

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

BMT DESIGNERS & PLANNERS, INC.,

Debtor.

Chapter 7

Case No. 1-22-10123-MG

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE**

PLEASE TAKE NOTICE that the undersigned hereby appear as counsel for BMT Global Ltd (“**BMT**”) and requests that all notices given or required to be given, and all papers served or required to be served, in this case be given to and served on:

Hugh McCullough  
Davis Wright Tremaine LLP  
920 Fifth Avenue, Suite 3300  
Seattle, Washington 98104-1610  
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and

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PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) but also includes, without limitation, notices of any pleadings, motions, stipulations, applications, orders, complaints, demands, hearings, answers, responses, memoranda and/or

briefs in support of the foregoing, any other documents brought before the Court with respect to those pleadings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telex, facsimile, e-mail or other electronic format, or otherwise, which (1) affects or seeks to affect in any way any rights, obligations or interests of the debtor, the trustee, any creditor, or any other party-in-interest in this case, including, without limitation, BMT, or (2) requires or seeks to require any act, delivery of any property, payment or other conduct of BMT.

PLEASE TAKE FURTHER NOTICE that BMT intends that neither this Notice of Appearance nor any appearance, pleading, claim or suit shall be deemed or construed as: (a) an election of remedies; (b) a consent by BMT to the jurisdiction of this Court or any other court with respect to proceedings, if any, commenced in any case against or otherwise involving BMT; (c) a consent by BMT to a jury trial in this Court or any other court in any proceeding as to any and all matters so triable herein or in any case, controversy or proceeding related hereto, pursuant to 28 U.S.C. §157(e) or otherwise; (d) a waiver of the right of BMT to a trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as “core proceedings” pursuant to 28 U.S.C. §157(b)(2), and whether such jury trial is pursuant to statute or the United States Constitution; (e) a waiver of the right of BMT to have final orders in non-core matters entered only after de novo review and judgment by a District Court; (f) a waiver of the right of BMT to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; (g) a waiver of any past, present or future event of default; or (h) a waiver or limitation of any rights of BMT, including without limitation, a waiver of rights, claims, actions, defenses, set-offs or recoupments to which BMT is or may

be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments are expressly reserved by BMT.

Respectfully submitted this 29th day of February, 2024.

*/s/ Hugh McCullough*

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Counsel for BMT Global Ltd

**CERTIFICATE OF SERVICE**

I hereby certify that the Notice of Appearance and Request for Notice, has been served on those parties receiving electronic notification via the Court's CM/ECF System on February 29, 2024.

/s/ Hugh McCullough  
Hugh McCullough